

1 Mr. Andrey Klimov
2 Prospect Vernadskogo, 25, 1, 40
3 Moscow, Russia, 119331
4 klivan117@gmail.com
5 916-251-8233
6 Defendant *in pro per*

7 [List of Counsel/Parties Continued on Next Page]

8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

10 ARTEC GROUP, INC., a California)	Case No. 15-cv-03449-EMC
11 Corporation,)	
12 Plaintiff,)	STIPULATION AND [PROPOSED]
13 vs.)	ORDER RE: EXTENSION OF
14 ANDREY KLIMOV, an individual, et al.,)	DEADLINE TO ANSWER
15 Defendants.)	INTERROGATORIES BY KLIMOV
)	[L.R.6-2]
)	Judge: Honorable Edward M. Chen
)	Action Filed: July 27, 2015
)	
)	
)	
)	

1 [List of Counsel/Parties Continued]
2 Louise Ann Fernandez, Esq. – State Bar No. 86263
Email: laf@jmbm.com
3 An Nguyen Ruda, Esq. – State Bar No. 215453
Email: ahn@jmbm.com
4 JEFFER MANGELS BUTLER & MITCHELL LLP
2 Embarcadero Center, 5th Floor
5 San Francisco, CA 94111
Telephone: (415) 984-9613
6 Facsimile: (310) 712-3364
7 Benjamin Davidson, Esq. – State Bar No. 241859
Email: bdavidson@bendavidsonlaw.com
8 LAW OFFICES OF BENJAMIN DAVIDSON, P.C.
8383 Wilshire Boulevard, Suite 800
9 Beverly Hills, CA 90211
Telephone: (323) 456-8647
10 Facsimile: (310) 432-0104
11 Attorneys for Plaintiff
12 ARTEC GROUP, INC.
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 Pursuant to the United States District Court, Northern District of California Local
2 Rule 6-2, Mr. Andrey Klimov (Defendant) and Artec Group, Inc. ("Artec" or "Plaintiff"),
3 state and stipulate as follows:

4 1. Pursuant to the Court's February 3, 2017 Case Management and Pretrial
5 Order for Jury Trial (the "CMO") (Dkt. 171), the deadline for fact discovery is currently
6 scheduled for August 17, 2017.

7 2. Plaintiff served interrogatories (19 questions) to Defendant Klimov on July
8 14, 2017, and the responses are due on August 14, 2017.

9 3. Klimov spend portion of his 30 days allowed to answer interrogatories,
10 preparing for Settlement Conference by researching and writing Confidential Letter for
11 Judge LaPorte and Settlement Statement. He also spend some more time providing
12 additional discovery to plaintiff. He will also spend almost one week to fly to California
13 for mediation. This left very little time to answer properly and to search thoroughly
14 through his records.

15 4. The parties therefore agreed that the deadlines for his reply to interrogatories
16 may be extended to August 22, 2017, in order to provide sufficient time for proper and full
17 response. Extension of this date will not affect any other dates or deadlines in the CMO.

18 THEREFORE, the Parties agree and request the Court to enter an order modifying
19 the date Mr. Klimov's responses to interrogatories are due to August 22, 2017.

20 IT IS SO STIPULATED.

21
22 Concurrence in the filing of this stipulation has been obtained from each of the
23 other Signatories.

24 Dated: Aug 3, 2017 Respectfully submitted,

25
26 By: /s/ Andrey Klimov
27 ANDREY KLIMOV
28 Defendant, *in pro per*

1 By: /s/ Rachel M. Capoccia
Louise Ann Fernandez
2 An Nguyen Ruda
Rachel M. Capoccia
3 JEFFER MANGELS BUTLER & MITCHELL LLP
4
Benjamin Davidson
5 LAW OFFICES OF BENJAMIN DAVIDSON, P.C.
6
Attorneys for Plaintiff
7 ARTEC GROUP, INC.
8

9 **ORDER**

10
11 PURSUANT TO STIPULATION, IT IS SO ORDERED.

12
13 Dated: 8/3/17

